

1 Anna Y. Park, CA SBN 164242  
2 Nakkisa Akhavan, CA SBN 286260  
3 Derek Li, CA SBN 150122  
4 Maurice Aaron Neishlos, CA SBN 338942  
5 U.S. EQUAL EMPLOYMENT  
6 OPPORTUNITY COMMISSION  
7 255 East Temple Street, Fourth Floor  
8 Los Angeles, California, 90012  
9 Telephone: (213) 785-3080  
10 Facsimile: (213) 894-1301  
11 Email: lado.legal@eeoc.gov

12 Connie K. Liem, TX SBN 791113  
13 U.S. EQUAL EMPLOYMENT  
14 OPPORTUNITY COMMISSION  
15 555 West Beech Street, Suite 504  
16 Telephone: (619) 900-1617  
17 Facsimile: (619) 557-7274  
18 E-Mail: connie.liem@eeoc.gov

19 Attorneys for Plaintiff  
20 U.S. EQUAL EMPLOYMENT  
21 OPPORTUNITY COMMISSION

22 **UNITED STATES DISTRICT COURT**  
23 **DISTRICT OF NEVADA**

24 U.S. EQUAL EMPLOYMENT  
25 OPPORTUNITY COMMISSION,

26 Plaintiff,

27 vs.

28 AMTCR, INC., AMTCR NEVADA,  
INC., and AMTCR CALIFORNIA,  
LLC, collectively dba McDonald's, and  
DOES 1-10, inclusive,

Defendants.

CASE NO. 2:21-cv-01808-JAD-NJK

**ORDER GRANTING  
STIPULATED REQUEST FOR  
STAY OF PROCEEDINGS  
PENDING PRIVATE  
MEDIATION**

ECF No. 7

1 To the Honorable Judges of Said Court:

2 Plaintiff United States Equal Employment Opportunity Commission  
3 (“Plaintiff” or “EEOC”) and Defendants AMTCR, INC., AMTCR NEVADA,  
4 INC., and AMTCR CALIFORNIA, LLC (“Defendants”) (collectively the  
5 “Parties”), by and through their respective counsel of record, hereby stipulate and  
6 request a ninety (90) day stay of proceedings in this matter, or until April 18,  
7 2022 to allow the Parties to participate in private mediation and conserve  
8 resources.

9 On September 29, 2021, Plaintiff filed a Complaint under Title VII of the  
10 Civil Rights Act of 1964, as amended (hereinafter “Title VII”), and Title I of the  
11 Civil Rights Act of 1991 (the “Action”), asserting violations of Section 703(a) of  
12 Title VII. (ECF No. 1) On November 8, 2021, all three Defendants waived  
13 service of process of summons. (ECF No. 4) Accordingly, Defendants’ deadline  
14 for filing an Answer or response to the EEOC’s Complaint was December 24,  
15 2021. As of this date, none of the Defendants have filed an Answer. This Court  
16 has not issued a scheduling order.


17 On or about January 3, 2022, Defendants’ counsel Ines Monte represented  
18 to the EEOC that she was unable to file an Answer/responsive pleading by  
19 December 24, 2021 due to a medical condition on which she had not yet  
20 recovered. Ms. Monte also indicated to the EEOC that Defendants were  
21 amenable to participating in private mediation in hopes of avoiding protracted  
22 litigation and conserve resources. As professional courtesy, the EEOC agreed to  
23 stipulate to a ninety (90) day stay of proceedings pending private mediation. As  
24 of this date, the Parties have agreed to participate in a full day private mediation  
25 session with the Hon. Edward Infante (Ret.), a former Chief U.S. Magistrate  
26 Judge and currently at JAMS ADR. The Parties are currently engaged in finding  
27 a mutually agreeable date for the mediation session in the near future.

28 In light of these circumstances, the Parties have been diligent. The Parties’

1 stipulation to stay proceedings is not sought for any improper purpose or delay,  
2 but to allow the Parties to efficiently and effectively settle this Action through  
3 private mediation and conserve judicial resources.<sup>1</sup> The EEOC intends to file a  
4 status report regarding settlement no later than April 8, 2022. Accordingly, for  
5 the reasons stated herein, good cause exists to grant the stay.

6  
7 So stipulated,

8  
9 Dated: January 28, 2022

  
10 Ines Monte  
11 LaPointe Law  
12 1200 Shermer Rd., Suite 425  
13 Northbrook, IL 60062  
14 Phone: (847) 786-2503  
15 E-Mail: [imonte@lapointelaw.com](mailto:imonte@lapointelaw.com)

16 Attorney for Defendants  
17 AMTCR, INC.  
18 AMTCR NEVADA, INC., and  
19 AMTCR CALIFORNIA, LLC

20 Dated: January 28, 2022

S/ Connie K. Liem  
21 Connie K. Liem  
22 Senior Trial Attorney

23 Attorney for Plaintiff EEOC  
24


---

25 <sup>1</sup> This stipulation is entered solely for the purpose of settlement discussions.  
26 Defendants contend that this stipulation is not intended to serve as an appearance  
27 by any of the Defendants named in this action. Defendants reserve all arguments  
28 regarding lack of subject matter and/or personal jurisdiction over Defendants in  
this action. The EEOC contends that subject matter jurisdiction and personal  
jurisdiction are proper in this action.

**ORDER**

Based on the Parties' stipulation [ECF No. 7] and good cause appearing, the Court **ORDERS** that:

1. All formal proceedings in this case are **STAYED** until April 18, 2022.
2. The Parties must file a joint status report regarding settlement no later than April 8, 2022.

  
\_\_\_\_\_  
U.S. District Judge  
February 9, 2022